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Attorneys for Plaintiff  
LEIGHTON TECHNOLOGIES LLC

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

LEIGHTON TECHNOLOGIES LLC,	)	04 Civ. 02496 (CM)
	)	
Plaintiff and Counterclaim Defendant,	)	<b>DECLARATION OF KEITH R.</b>
	)	<b>LEIGHTON</b>
v.	)	
	)	
OBERTHUR CARD SYSTEMS, S.A., and	)	
OBERTHUR CARD SYSTEMS OF AMERICA	)	
CORP.	)	
	)	
Defendants.	)	

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I, Keith Leighton, hereby declare under penalty of perjury, as follows:

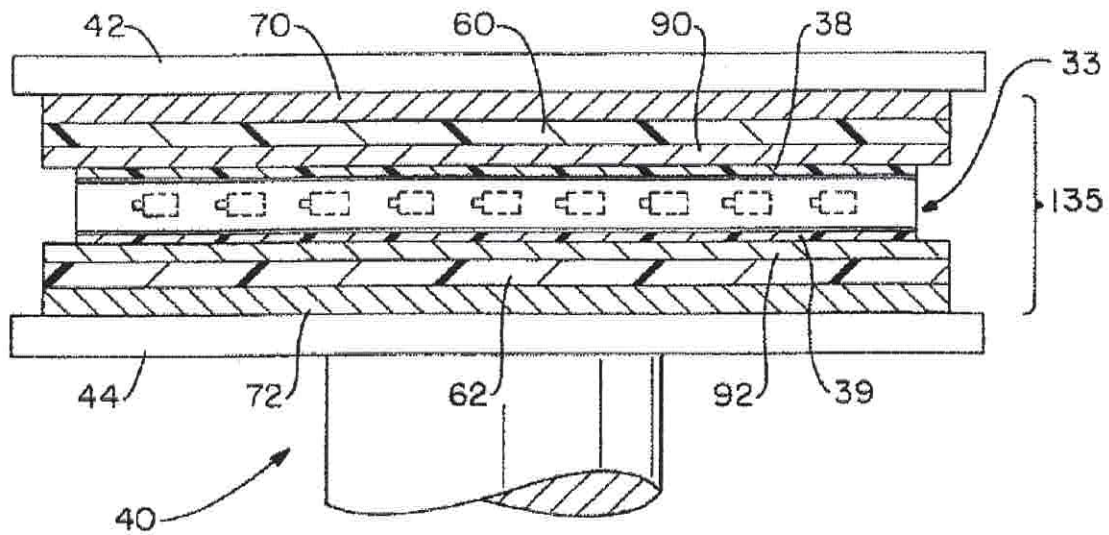
1. I am the inventor of US Patent Nos. 5,817,207; 6,036,099; 6,514,367; and 6,214,155.

This declaration is submitted in support of Leighton Technologies Opposition to the Defendant's Summary Judgment Motion for Invalidity. The information set forth herein is based upon my own personal knowledge, and if called as a witness I would testify thereto.

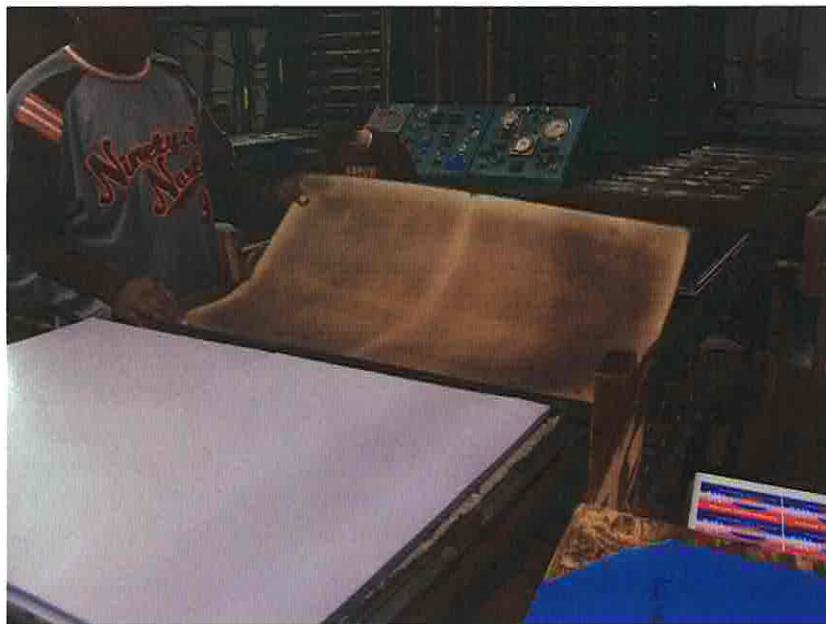
2. I am 73 years old and I have a high school diploma from Berkley High School in Berkley, Michigan, which I received in 1952. I have been involved in the color printing industry since 1953, when I first began working for General Motors as a

Plate Maker/Engraver. From 1970 –2000 I continued to work in the field of color printing, as well as working for a number of companies that manufactured plastic cards. Over the course of my career I have developed substantial hands on experience in the lamination of plastic cards, and I have served as a consultant for both the lamination and printing processes used to make such cards. I currently work as a machine operator at Invacare, a company that makes wheelchairs in Elyria, Ohio.

3. For many years standard plastic cards, and more recently contactless smart cards, have been made using the process of lamination. In general, the lamination of smart cards involves sandwiching electronic elements between layers of plastic and sealing them with heat and pressure.
  - a. The first step in the manufacture of a contactless smart card, or any plastic card for that matter that will be laminated involves building “books” made of layers of plastic, electronic elements (in the case of contactless cards), pads, and metal plates all of which sit in a lamination tray. A book may be made up of many layers of cards, similar to the single card layer illustrated at 135 from page 1 of my ‘155 patent.

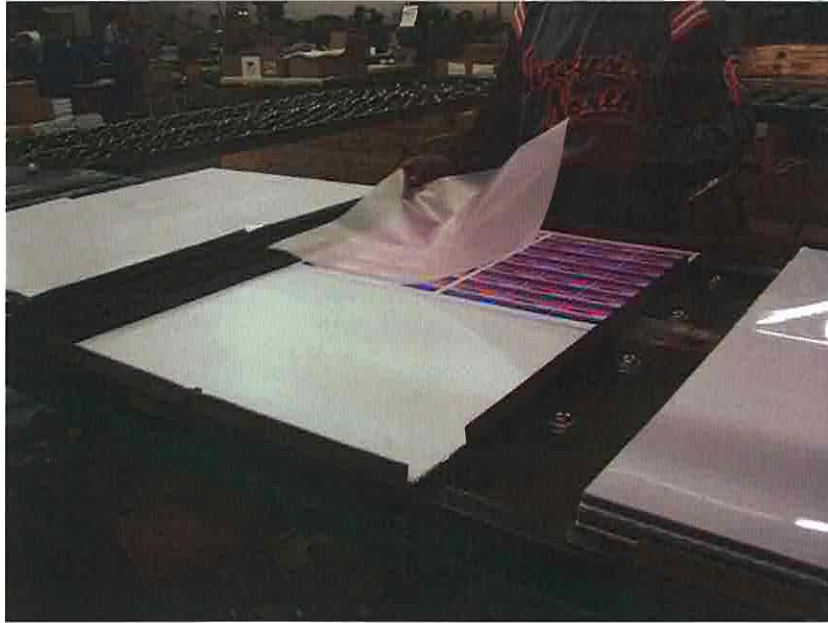


The following pictures illustrate the actual assembly of a book being built in a lamination tray. The book contains multiple layers of cards that are separated by pads and plates:









- b. The lamination tray containing the book is then placed into the daylight, or opening, in lamination machines similar to the ones set forth below.

